



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

August 25, 2022

United States Army Corps of Engineers
Southwestern Regional Planning and Environmental Center
P.O. Box 17300
Fort Worth, TX 76102-0300

Re: Conceptual Draft Sampling Plan for Matagorda Ship Channel Improvement Project Lavaca Bay

The U.S. Environmental Protection Agency (EPA) has reviewed the United States Army Corps of Engineers (USACE) Draft Sampling Plan for the Matagorda Ship Channel Improvement Project (MSCIP) and has the following comments:

1. **Section III. Data Quality Objectives:** The plan states that “Historic data were studied for appropriateness and used to establish a mean and standard deviation for sampling events within the harbor area in the vicinity of the MSCIP”. What decision criteria were used to determine “appropriateness” of historic data? What parameters were selected in VSP to create the sampling grid?
2. **Section III. Data Quality Objectives:** The USACE’s draft sampling plan relies on historic samples from 27 stations and proposes 24 new sample locations. However, it appears that 17 of the historic stations are from 2005. How has the USACE determined that sediment data from 2005 is appropriate for establishing statistical parameters in VSP?
3. In May 2022, Alcoa conducted an updated bathymetric survey and estimated sediment thickness map which EPA provided to the USACE on June 1, 2022. Has the USACE considered this data when developing parameters in VSP?

It is important that sediment is characterized before any dredging occurs at the Alcoa (Point Comfort)/Lavaca Bay Superfund Site (Site). Lastly, please provide the EPA a current schedule of work for the MSCIP. We appreciate the opportunity to review this document and look forward to continued collaboration with the USACE to minimize any potential impacts to the Site.

Sincerely,

A handwritten signature in black ink, appearing to read "Laura R. Hunt", is positioned above the printed name.

Laura R. Hunt, PhD
Project Manager